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Attorney for JAMES MECHAM

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	}	Case No.: 2:22-cr-00161-JAM
Plaintiff,		<b>STIPULATION AND ORDER TO SET TRIAL CONFIRMATION HEARING, JURY TRIAL, AND EXCLUDE TIME</b>
vs.		
JAMES MECHAM, KURT STOCKS, and HEIDI EDWARDS,	}	Date: November 19, 2024
Defendants		Time: 9:00 a.m. Judge: Hon. Judge John A. Mendez

**STIPULATION**

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney HEIKO COPPOLA, and defendant JAMES MECHAM, both individually and by and through his counsel of record, Thomas A. Johnson, defendant KURT STOCKS, both individually and by and through his counsel of record, Malcolm S. Segal, and defendant HEIDI EDWARDS, both individually and by and through her counsel of record, Christina Sinha, hereby stipulate as follows:

1. By previous order, the status conference as to all defendants in this matter was continued to November 19, 2024. Time was previously excluded by the Court up to and including November 19, 2024.

- 1 2. The parties request that the Court set this matter for jury trial on July 28, 2025. This  
2 date was selected based upon the consideration of the trial schedules of all counsel  
3 and the complexity of the case. The defendants also seek to exclude time under  
4 Local Code T-4 from November 19, 2024, to July 28, 2025, to prepare for trial. The  
5 discovery in this case is voluminous and consists of approximately 51,000 pages. It  
6 involves the investigation of twenty separate entities in an alleged money laundering  
7 scheme. It includes the seizure of over 17 separate bank accounts at 12 separate  
8 financial institutions. It involves the tracing of funds through 17 financial  
9 institutions over a period of 7 years. In U.S. District Court Case No. 2:18-mc-00013-  
10 WBS-AC are related civil forfeiture allegations involving 6 accounts with currency  
11 and 3 pieces of physical property. There are Lis Pendens (ECF No. 36-40) on five  
12 separate pieces of real property. There is property located both in California and  
13 Arizona. All of this discovery has been either produced directly to counsel, and/or  
14 made available for inspection and copying. Counsel for the defendants' desire  
15 additional time to review the voluminous discovery, conduct further investigation,  
16 consult with their clients and to otherwise prepare for trial.
- 17 3. Counsel for the defendants believe that failure to grant the above-requested  
18 continuance would deny them the reasonable time necessary for effective trial  
19 preparation, taking into account the exercise of due diligence.
- 20 4. The government does not object to this request.
- 21 5. The parties will set a Rule 12 motion schedule as needed after further discussion  
22 and consultation with the courtroom deputy, but at least 30 days prior to the Trial  
23 Confirmation Hearing.
- 24 6. Therefore, the parties stipulate that the ends of justice served by granting the  
25 continuance outweighs the best interest of the public and all defendants in a speedy  
26 trial, and respectfully request the Court so to find. For the purpose of computing  
27 time under 18 U.S.C. § 3161 et seq. (the Speedy Trial Act), the parties request that  
28 the time period between November 19, 2024, and July 28, 2025 (inclusive) be

1 deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4),  
2 because it would result from a continuance granted by the Court at the defense's  
3 request, based on a finding that the ends of justice served by granting the  
4 continuance outweighs the best interest of the public and all defendants in a speedy  
5 trial.

- 6 7. The parties therefore respectfully request this Court to adopt the parties' stipulation,  
7 detailed above, in full as its Order.

8  
9 **IT IS SO STIPULATED.**

10  
11 DATED: November 14, 2024

PHILLIP A. TALBERT  
United States Attorney

12  
13 /s/ Heiko Coppola  
HEIKO COPPOLA  
Assistant U.S. Attorney

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16 DATE: November 14, 2024

/s/ Thomas A. Johnson  
THOMAS A. JOHNSON  
Attorney for James Mecham

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21 DATE: November 14, 2024

/s/ Malcolm S. Segal  
MALCOLM S. SEGAL  
Attorney for Kurt Stocks

22  
23  
24 DATE: November 14, 2024

/s/ Christina Sinha  
CHRISTINA SINHA  
Attorney for Heidi Edwards

**ORDER**

Based on the stipulation of the parties and good cause appearing, the November 19, 2024 status conference is **VACATED**. A **trial confirmation hearing** is **SET** for **Tuesday, June 03, 2025**, and a **jury trial** is **SET** to commence on **Monday, July 28, 2025**, both at **09:00 a.m.**, in Courtroom 6, on the 14th floor of the Robert T. Matsui Federal Courthouse, before Senior District Judge John A. Mendez.

Time is **EXCLUDED** through and including July 28, 2025, as described in the parties' Stipulation.

IT IS SO ORDERED.

Dated: November 15, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE